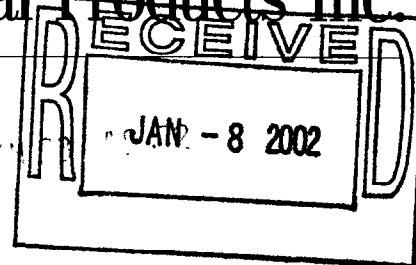


Natural Factors Nutritional Products Inc.



November 29, 2001

Food and Drug Administration
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
200 C St. SW
Washington, DC 20204

Dear Sir or Madam:

This is to provide the required information to comply with our obligation under DSHEA labeling regulations.

Supplement: Alpha-Lipoic Acid

Manufacturer, packer: Natural Factors Nutritional Products, Ltd.
1550 United Blvd.
Coquitlam, B.C.
Canada V3K 6Y7

Distributor: Natural Factors Nutritional Products, Inc.
1111 80th St. SW, Suite 100
Everett, WA 98203

Text of side Panel: Natural Factors Alpha-lipoic Acid is a powerful antioxidant that helps protect the body against damaging free-radicals.* Unlike other antioxidants, Alpha-lipoic Acid is both water and fat soluble and can therefore quench free-radicals both inside cells and in intracellular spaces. It is the "metabolic antioxidant" because of its role as a coenzyme in human metabolism. Natural Factors Alpha-lipoic Acid is made from the finest materials available and is frequently tested for impurities.

Text of PDP: POTENT ANTIOXIDANT PROTECTION*

1111 80th Street S.W., Suite 100
Everett, WA, USA 98203
Phone: (425) 513-8800
Fax: (425) 348-9050

975-0162

LET 8991
78861

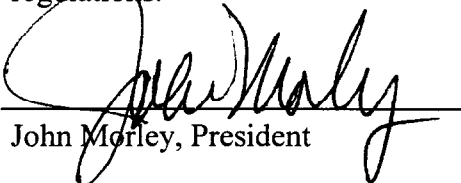


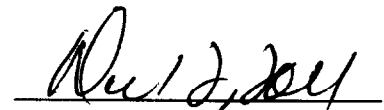
Natural Factors Nutritional Products Inc.

Name of dietary ingredient that is the subject of statement: Alpha-Lipoic Acid

Name of dietary supplement: Alpha-Lipoic Acid 100mg

I represent the information presented to be accurate and in compliance with supplement label regulations.


John Morley, President


Date

1111 80th Street S.W., Suite 100
Everett, WA, USA 98203
Phone: (425) 513-8800
Fax: (425) 348-9050

